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COMMUNITY RELATIONS PLAN
FOR THE
IDAHO POLE SUPERFUND SITE
BOZEMAN, MONTANA

PLEASE RETURN

DATE DUE

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COMMUNITY RELATIONS PLAN

FOR THE

IDAHO POLE SUPERFUND SITE

BOZEMAN, MONTANA

PLEASE RETURN

Montana Department of Health and Environmental Sciences

Solid and Hazardous Waste Bureau

Room B201, Cogswell Building, Helena, MT 59620

May 1989

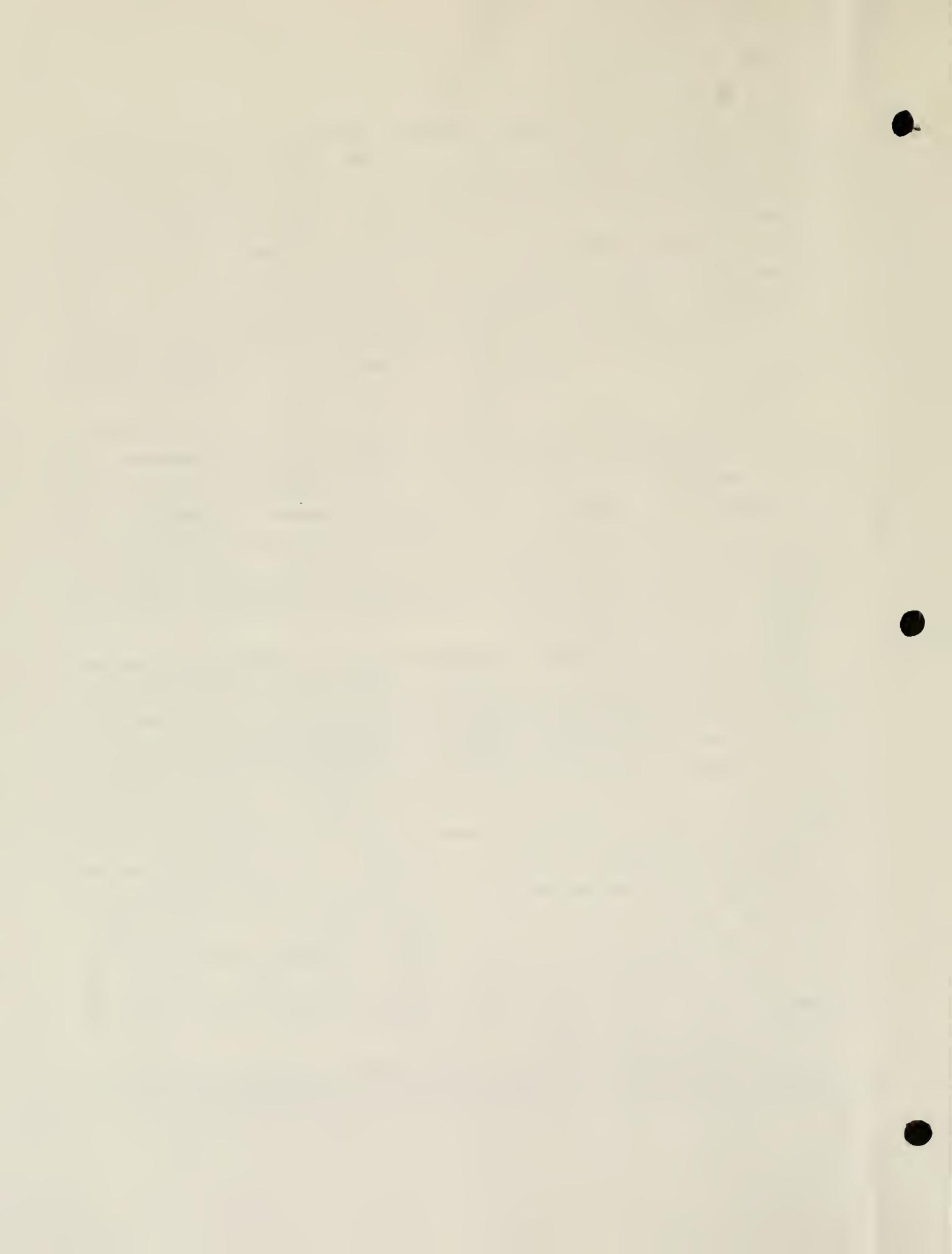
This community relations plan summarizes community concerns and outlines community relations activities to be conducted during Superfund remedial investigation and feasibility study activities at the Idaho Pole Superfund site in Bozeman, Montana. The Montana Department of Health and Environmental Sciences has lead responsibility for managing the remedial and community relations activities and supervising site-related activities.

This plan is based on interviews with local and state government officials and other interested parties. These interviews were conducted in the Bozeman area in October 1988. A representative from EPA and two from MDHES conducted the interviews.

This plan was prepared in accordance with guidance found in Community Relations in Superfund: A Handbook, Interim Version, Office of Emergency and Remedial Response, U.S. EPA, June 1988. The Handbook spells out the stipulations of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and as stipulated in the rules that interpret the Superfund legislation, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The purpose of the community relations plan is to identify the concerns of people affected by the site, and develop methods to address those concerns. MDHES is required by Departmental and Superfund policy to conduct community interviews, and based on these interviews, to prepare a community relations plan that includes a description of the site background, history of community involvement at the site (including major community concerns), community relations strategies, a schedule of community relations activities, and a list of affected and interested groups and individuals. The interviews form the foundation for developing the appropriate information to be disseminated to the public, and for determining what actions are necessary to deal with public concerns. The Handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views."

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of



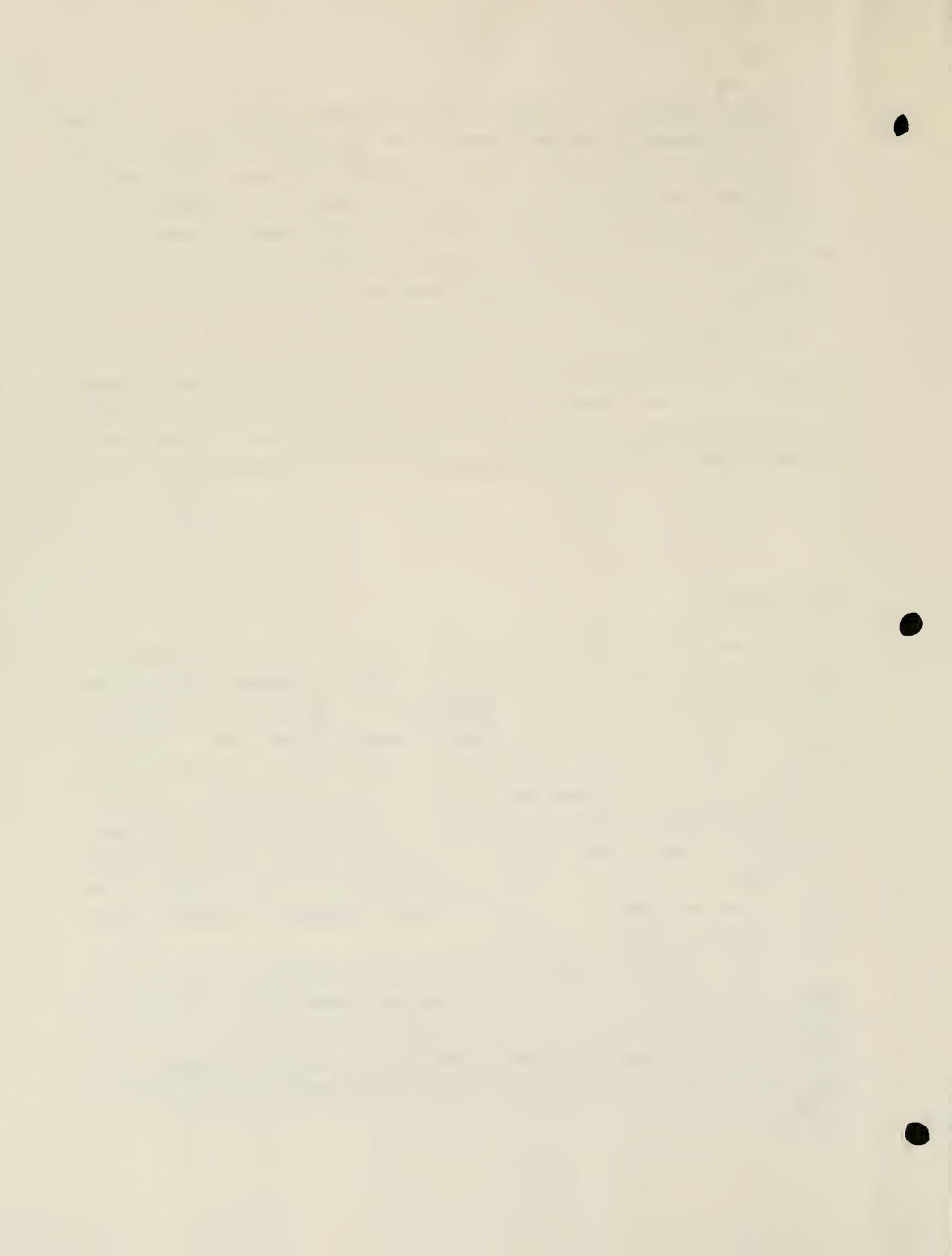
the Montana Department of Health and Environmental Sciences, EPA, or the potentially responsible parties (PRPs). The information developed in these interviews and summarized in the community relations plan reflects interviewees' responses, whether or not those responses are factually precise or accurately portray conditions at the site. The community relations plan serves as a basis for addressing community concerns and also for clarifying misinformation identified in community responses. The plan suggests measures for accomplishing both of these objectives.

This community relations plan is designed to direct community relations activities for Montana Department of Health and Environmental Sciences (MDHES) and the U.S. Environmental Protection Agency (EPA) during remedial investigation/feasibility study activities at the Idaho Pole Superfund site in Bozeman, Montana. MDHES has lead responsibility for site management.

SITE BACKGROUND

The Idaho Pole Company (IPC) pole treating facility is located in Bozeman, Montana along U.S. Interstate 90. Idaho Pole Company, doing business as McFarland-Cascade, of Tacoma, Washington, is an identified potentially responsible party. The plant has been in operation since 1946. Initially, creosote was used as the preservative compound, but in 1952 the plant switched to a five percent Pentachlorophenol (PCP) in carrier oil mixture. Burlington Northern Railroad has also been identified as a potentially responsible party as a result of their land ownership and leasing of most of the site during wood treatment activities. In 1975, Burlington Northern sold a portion of the site to Idaho Pole Company and in 1987 sold its remaining Idaho Pole Company lease interests to Montana Rail Link.

IPC wood treating equipment included a butt treating vat and two pole length treating vats. In 1975, a pressurized heated retort was added for treating full length poles. The pole length vats were removed in the early 1980's. The pressurized heated retort and the butt treating vat continue to be used. There is also a drying area where treated poles are stored prior to shipment.

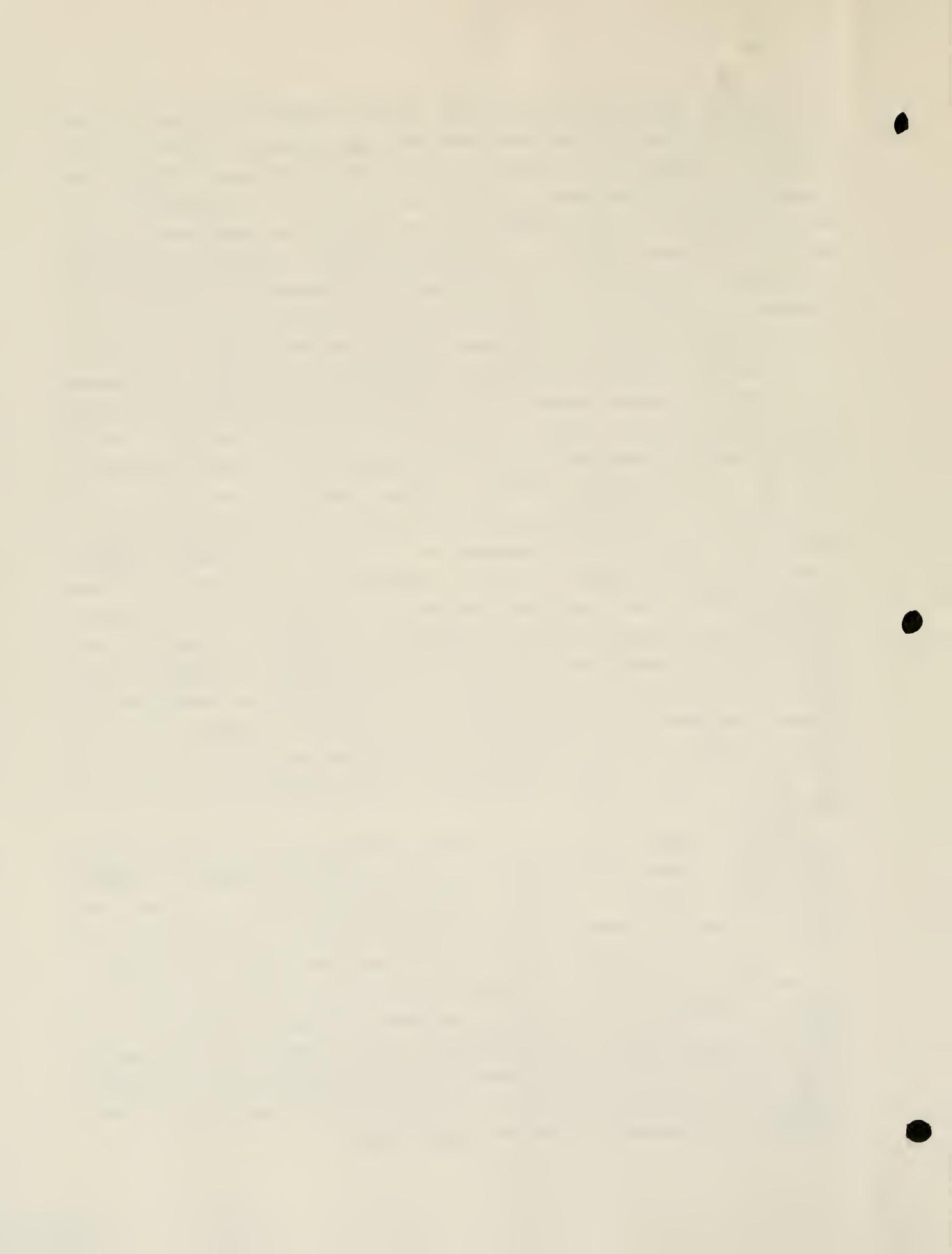


Gallatin County Health Department records document discharges of wood preservative compound or "creosote-like" substance as early as 1968. In 1975, a Montana Department of Health and Environmental Sciences (MDHES) field inspection of IPC indicated no surface contamination or contaminated surface water discharge. In 1978, MDHES was notified by the Department of Fish, Wildlife, and Parks (DFWP), of a suspected discharge. The MDHES Water Quality Bureau (WQB) inspected and found evidence of a discharge to Rocky Creek. In response, the WQB issued a Compliance Order on September 29, 1978, notifying IPC of statutory violations and directing IPC to provide remedial compliance.

Since 1978, a variety of remedial measures have taken place in an attempt to retard or eliminate movement of the preservative and carrier oil through ground and surface water and into private wells and state waters. An oil recovery sump and subsequently a concrete wing-wall were initially proposed by IPC but not implemented because of later doubts by IPC as to their effectiveness. Installed measures have included an interceptor drain with a sump, an interceptor trench adjacent to I-90 with a continuous absorbent skimmer and a rope skimmer. Reclaimed preservative is recycled to the pole treating facility. Absorbent pads have also been sporadically used in a number of culverts and ditches to intercept preservative fluid prior to reaching Rocky Creek. State personnel have visited the site periodically and judged the pads to be too saturated with preservative oil to be effective, and recommended more frequent replacement. The pads were not in use during an EPA/State site visit in December 1987. IPC had reconstructed the trench to prevent overflow into the culvert during typical rainstorms, thus contending the pads to be unnecessary.

Culverts passing under I-90 are dammed to retard flow of surface runoff to Rocky Creek. However, during high flow periods, discharge through the culverts has normally occurred. No formal water treatment facility has been used; however, a sand and carbon filtration treatment system was installed in the early 1980's in the retort building, but has never been operated successfully.

In 1984, IPC retained a contractor, Applied Geotechnology Inc, (AGI) of Bellevue, Washington, to conduct a non-CERCLA remedial investigation. AGI drilled monitoring wells, and collected soil, ground, and surface water samples in an effort to 1) identify the extent of PCP contamination, and 2) determine the actual or likely sources of PCP discharges. AGI's study (only one draft) was found to be incomplete by the EPA, WQB and SHWB.



The EPA-Emergency Response Team conducted a soil gas survey in December 1986 and groundwater well sampling series in 1986 and 1987. Their studies indicated that the site was in need of additional remediation.

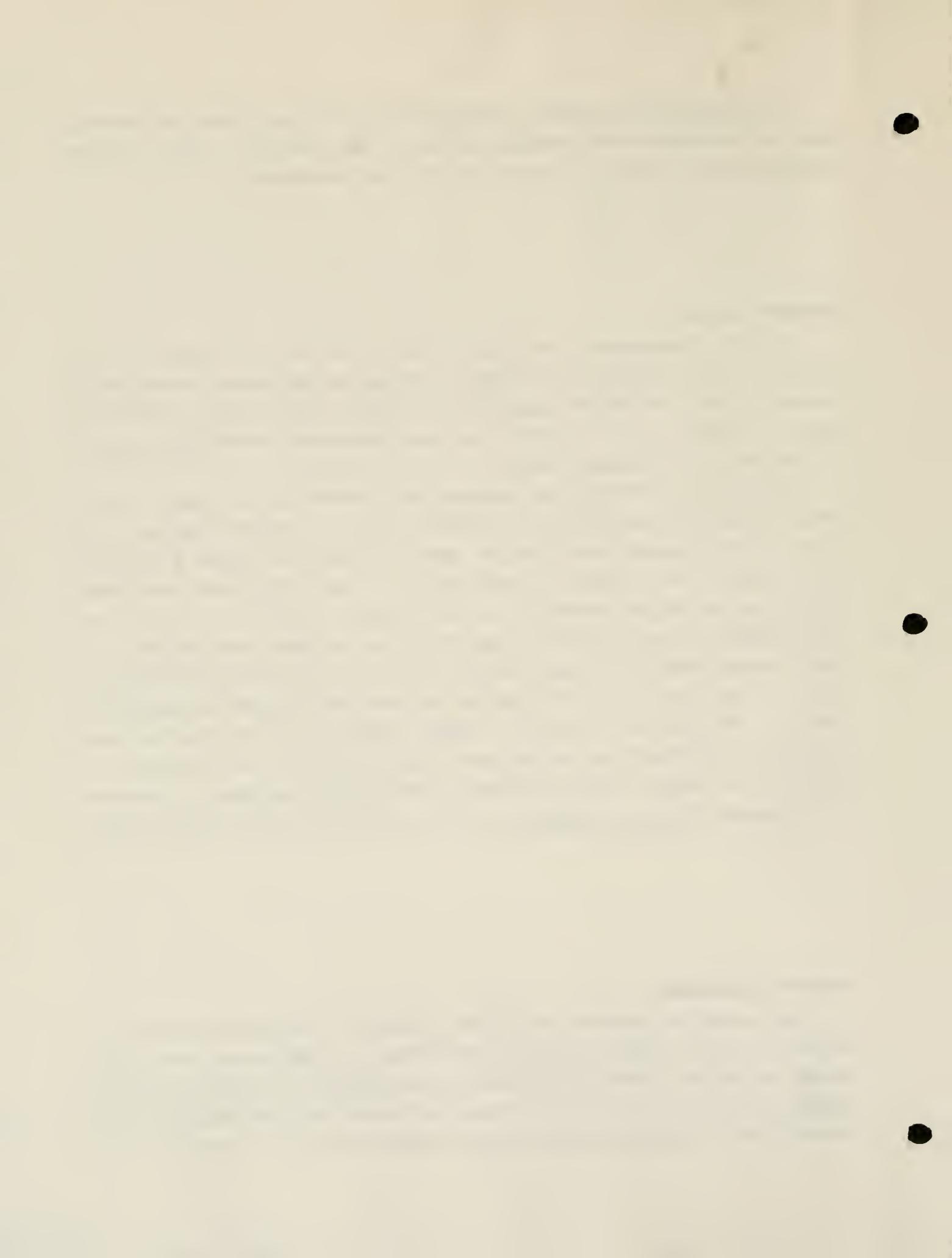
COMMUNITY HISTORY

Covering approximately 8.5 square miles, Bozeman is located in the Gallatin Valley in south-central Montana. Bozeman is the home of Montana State University (MSU) and a total population of 23,800 (1985 census). MSU has an annual enrollment of 10,700 students and contributes the greatest percentage of any business to the Bozeman economy -- 26 percent annually.

Bozeman was named for John Bozeman, who traveled across Wyoming and in 1864, guided the first train of immigrants into the Gallatin Valley. Jim Bridger guided another train into the area that same year, using a different pass. Bozeman was killed by Piegan Indians in April 1867 as he was coming through an especially narrow part of the valley. The town for a time was called Missouri because of the number of Missourians among the settlers. In 1867, Bozeman became the county seat of one of the nine original territorial counties. The town started in 1864 and the post office opened in December of 1868 with John Roth as postmaster. Montana State College (now Montana State University) was established in 1893, one of the early land grant colleges. The coming of the Northern Pacific Railway in 1883 assured the growth of Bozeman. (From Names on the Face of Montana, by Roberta Carkeek Cheney, published 1983)

COMMUNITY BACKGROUND

Many people in Bozeman are outdoor oriented. Recreation in the area includes skiing, fishing, hunting, and hiking, in addition to many other outdoor activities. Winter activities are also popular in Bozeman with annual average snowfall of 83.5 inches. Bozeman is located 90 miles from Yellowstone National Park. One interviewee described Bozeman as being an interesting blend



of agricultural and business people. Agriculture adds the second highest percentage to the Bozeman economy -- 21 percent. Tourism is an important factor in the Bozeman economy, contributing 12 percent annually.

COMMUNITY CONCERNS

During the on-site interviews, residents expressed a number of concerns about the site, although overall concern about the site ranges from low to moderate. Following is a list of those concerns:

♦ Possible health effects

Several interviewees said they were concerned about the presence of contaminants in private wells and how it might affect their health.

♦ Lack of information about site investigation and contaminants

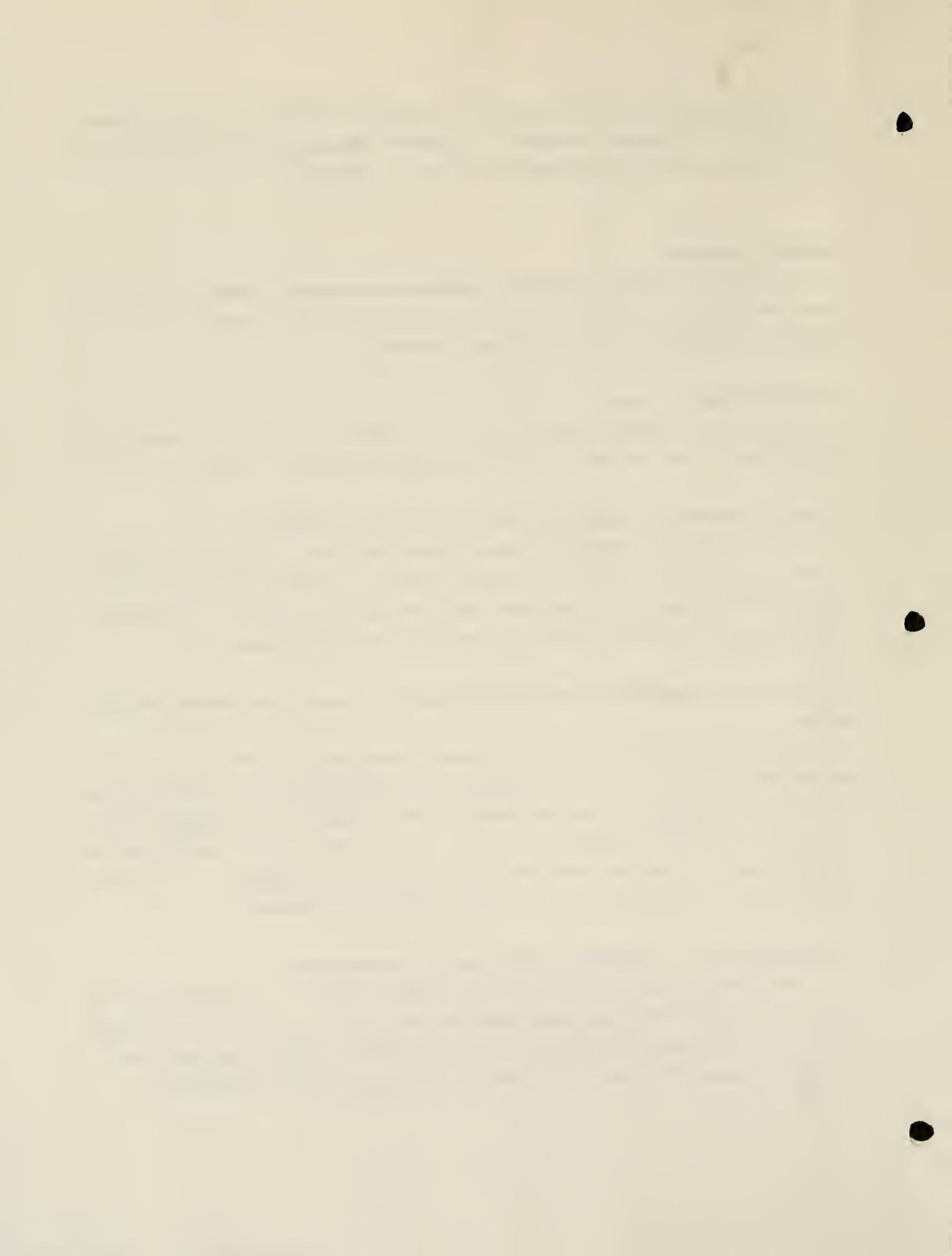
All interviewees expressed concern about the lack of public involvement, so far, at the site. All said they would like more information about the site. Many mentioned that public meetings would be helpful so they can learn about the site and ask questions and make comments about future plans.

♦ Concern that groundwater contaminant plume will spread and contaminate more wells

Concern was voiced that more privately owned wells in the site area will be contaminated. One local government official said his office receives calls from people interested in buying houses in the "L" Street area adjacent to the site who are concerned about contamination. This same official said a man who wanted to put in a mobile home park near the site was stopped because the city would not grant him a sewer permit, due to possible contamination.

♦ Possible decline in property values due to contamination

Interviewees expressed concern that property values will decline near the site as the public becomes more aware of contamination. These interviewees said a lack of public education is not the answer, however, and that only a complete cleanup of the site will keep property values up and increasing.



♦ **Ineffective use of Superfund money**

One interviewee expressed strong concern that Superfund money is not being put to the best possible use at the site. This interviewee suggested that too much legal involvement is costly and slows the process tremendously.

♦ **Fate of recovered wastes**

An interviewee said he was concerned that waste oil recovered from the groundwater will not be safely disposed of. He expressed frustration that many Superfund wastes are simply moved and never truly destroyed.

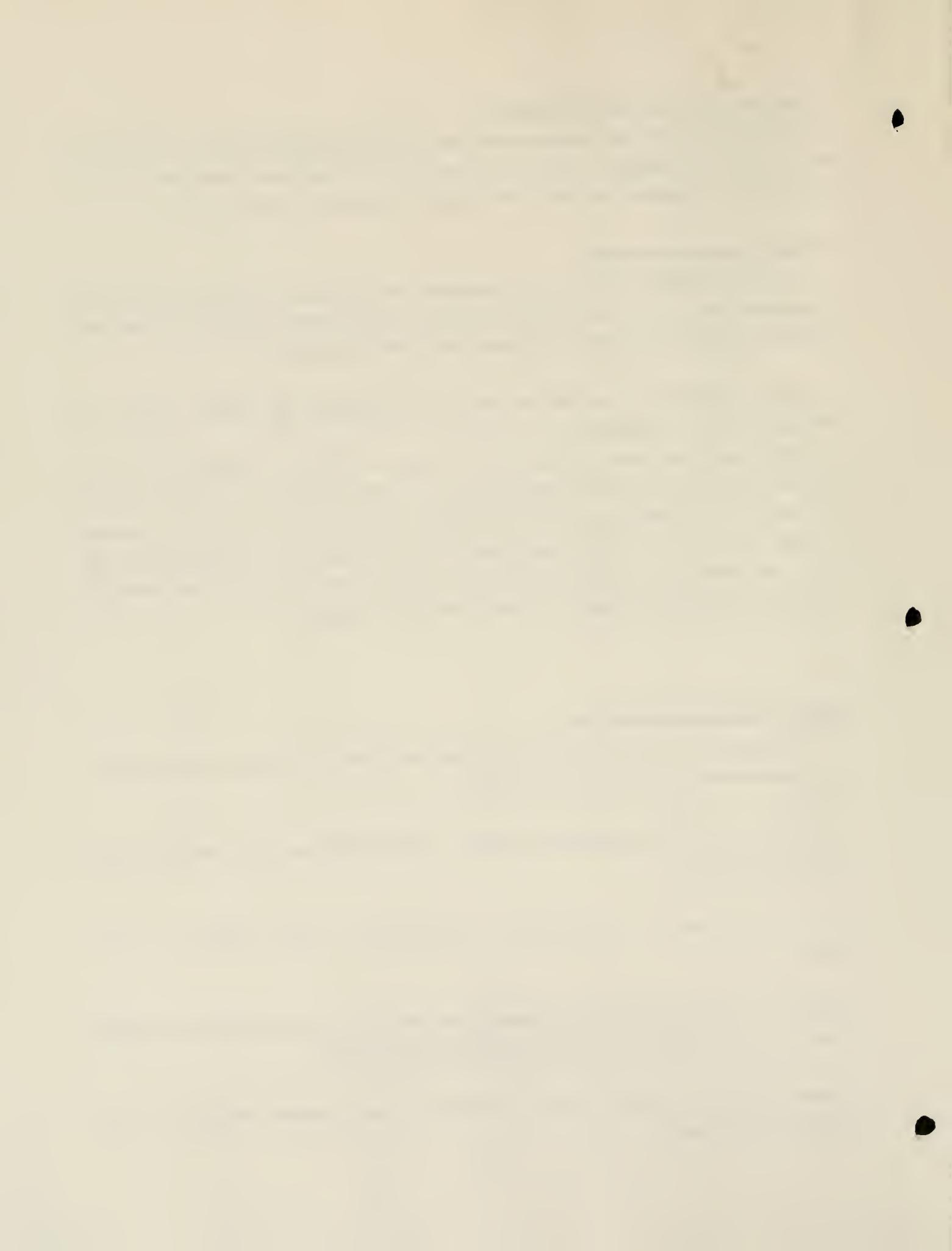
♦ **Concern that public officials are not being kept up-to-date about site developments and activities**

One local government official said they are often the first ones called when the public has questions about the site. This official said he would like more current information and to feel more involved in the site. An elected official said he has often heard conflicting information from the MDHES and EPA. He added that the two agencies need to work together on community relations to lessen the public's confusion about the site.

COMMUNITY RELATIONS OBJECTIVES

Following is a list of objectives MDHES and EPA will strive to meet during RI/FS activities at the Montana Pole site:

- 1) Keep the lines of communication open between MDHES and EPA, and any other involved agencies.
- 2) Keep the lines of communication open between involved agencies and the public.
- 3) Make sure local government officials are kept up to date and are encouraged to be actively involved in Superfund activities at site.
- 4) Be available, without cost, to the public and respond quickly to their questions and concerns.



- 5) Educate the public about the Superfund process in general and about the site, specifically.
- 6) Be aware of and respond to public sentiment throughout the Superfund process at the site.
- 7) Clarify the relationships among different site activities and actions carried out under various Superfund programs by all the involved agencies.

COMMUNITY RELATIONS TECHNIQUES

Following is a list of community relations techniques for the Idaho Pole site which should be effective. Increased involvement with the community there will help MDHES develop even more effective techniques as insight is gained about what the community wants.

1) Public Meetings

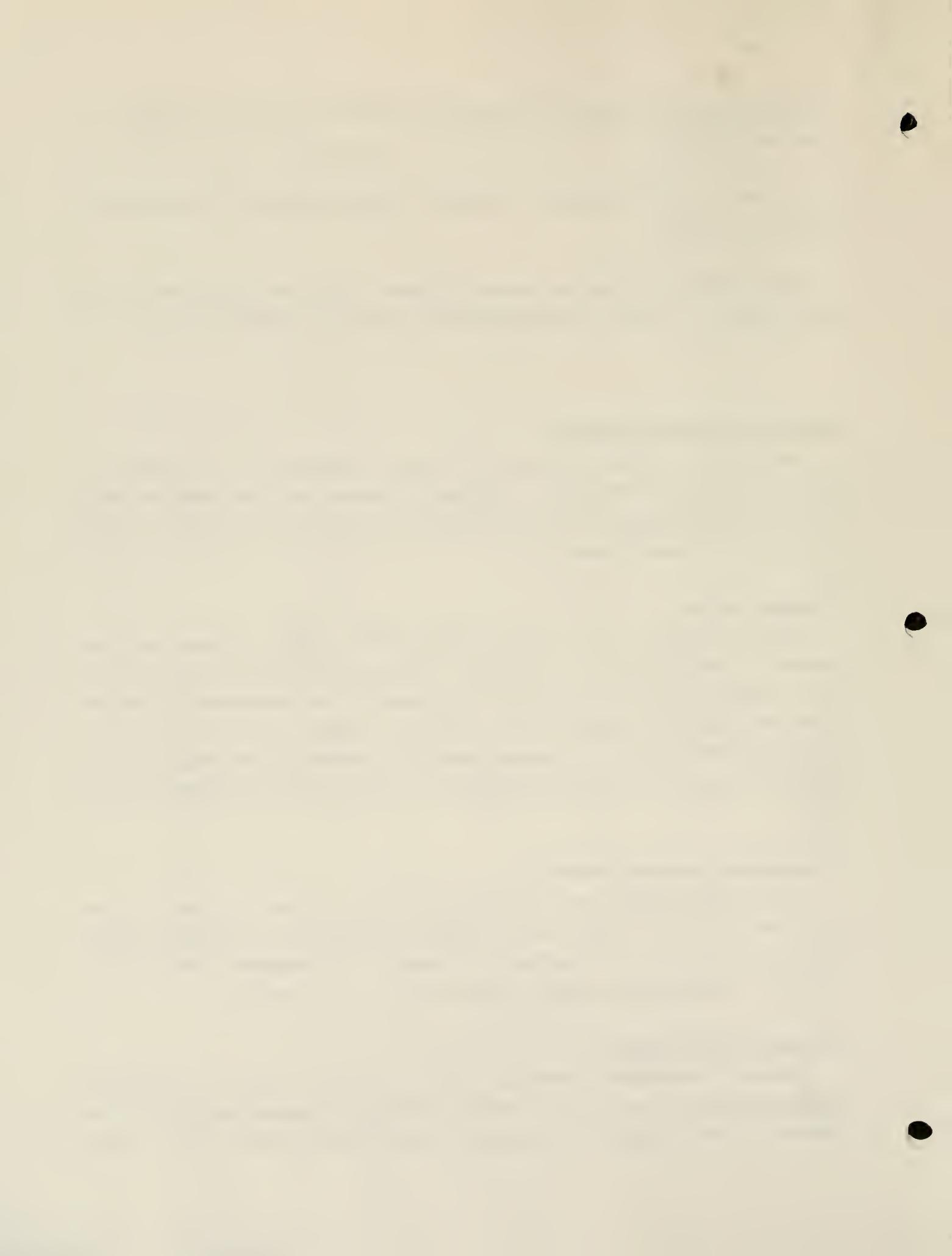
Public meetings will be held during public comment periods and when important study information is released. The meeting format will be tailored to encourage audience participation. Speakers will be encouraged to explain events and findings in layman's terms and to use visual aids when appropriate. Meetings should be held in a location readily accessible to the Idaho Pole site community, such as a nearby public facility or one of the nearby motel meeting rooms.

2) Establish a Document Repository

Site documents and other information should be made available to the public near the site. MDHES will establish a repository in a public building in Bozeman where there is access to a copier. A preferable location is a library, so residents can check the material out of the repository.

3) Citizen group meetings

Periodic information meetings should be held with the immediate neighborhood around the site. As major findings and information of value and interest to the residents are developed, group meetings will be held to keep



the residents informed.

4) Press releases

Press releases are an important means of getting information to the public. Most people interviewed said they learn about the site by reading about it in the newspaper or by hearing about it on television or radio. (See appendix A for sample press release.)

5) Progress reports

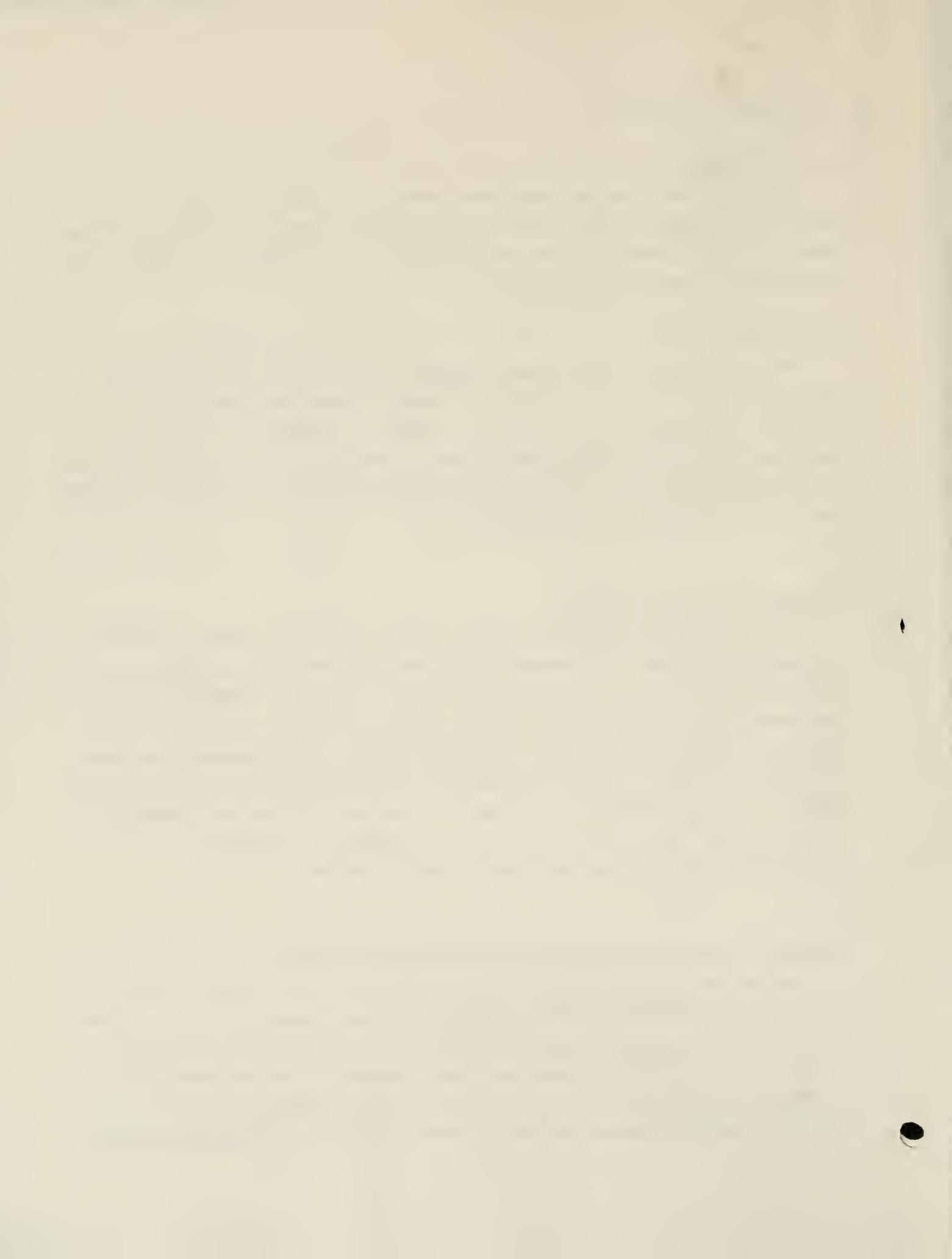
Progress reports, unlike press releases, will be sent to the public also. Progress reports should be written in layman's terms and attention should be given to the length of each section. Many fact sheets are too wordy and discourage the reader from finishing them. Topics of interest should be broken into separate sections. A larger typestyle should also be considered, as should the use of easily understood graphics.

6) Personal one-on-one contact

Door-to-door and telephone contacts should be made at least a week before any sampling is done. This procedure will be used, not only to gain access to private property, but also to inform the public about the sampling process. When practical, contacts will be made by people working in pairs for safety. The contact people should deliver a letter or packet of information from MDHES. The information should explain the issues and provide residents with names and phone numbers of persons to contact for further information. Results of sample analyses will be provided to the appropriate landowner as soon as possible after the data has been quality control checked.

7) Educate the public about their role in site participation

Develop and use information to be included in Progress Reports describing the Superfund community relations program and public comment provisions. This should include the names, locations, and hours of the information repositories, as well as the names, addresses, and phone numbers of EPA and MDHES personnel to contact with specific questions. It should also include general information about the Superfund process and public comment provisions. Technical personnel



should always carry a supply of Progress Reports to be handed out when conducting on-site activities.

8) Continue to remind the public of the toll-free hotline

A toll-free Superfund hotline was set up at the Montana Department of Health and Environmental Sciences in June 1987. The purpose of the hotline is to give the public a clearinghouse for their questions, comments, and concerns about any Superfund activities in Montana. The toll-free number should be included on all press releases, newsletters, fact sheets, flyers, etc. Small posters with the number could be placed in public buildings in the Bozeman area.

9) Hold regular meetings among key personnel involved in the site

To provide coordination among the activities in progress at Idaho Pole, key personnel should meet periodically. Key personnel may include MDHES and EPA project staff, community relations representatives, and local officials in Bozeman. (Local officials may include, but not be limited to county commissioners, Gallatin County Health Department, Bozeman Mayor and City Council and U.S. Congressional aides.)

10) Maintain and update the mailing list

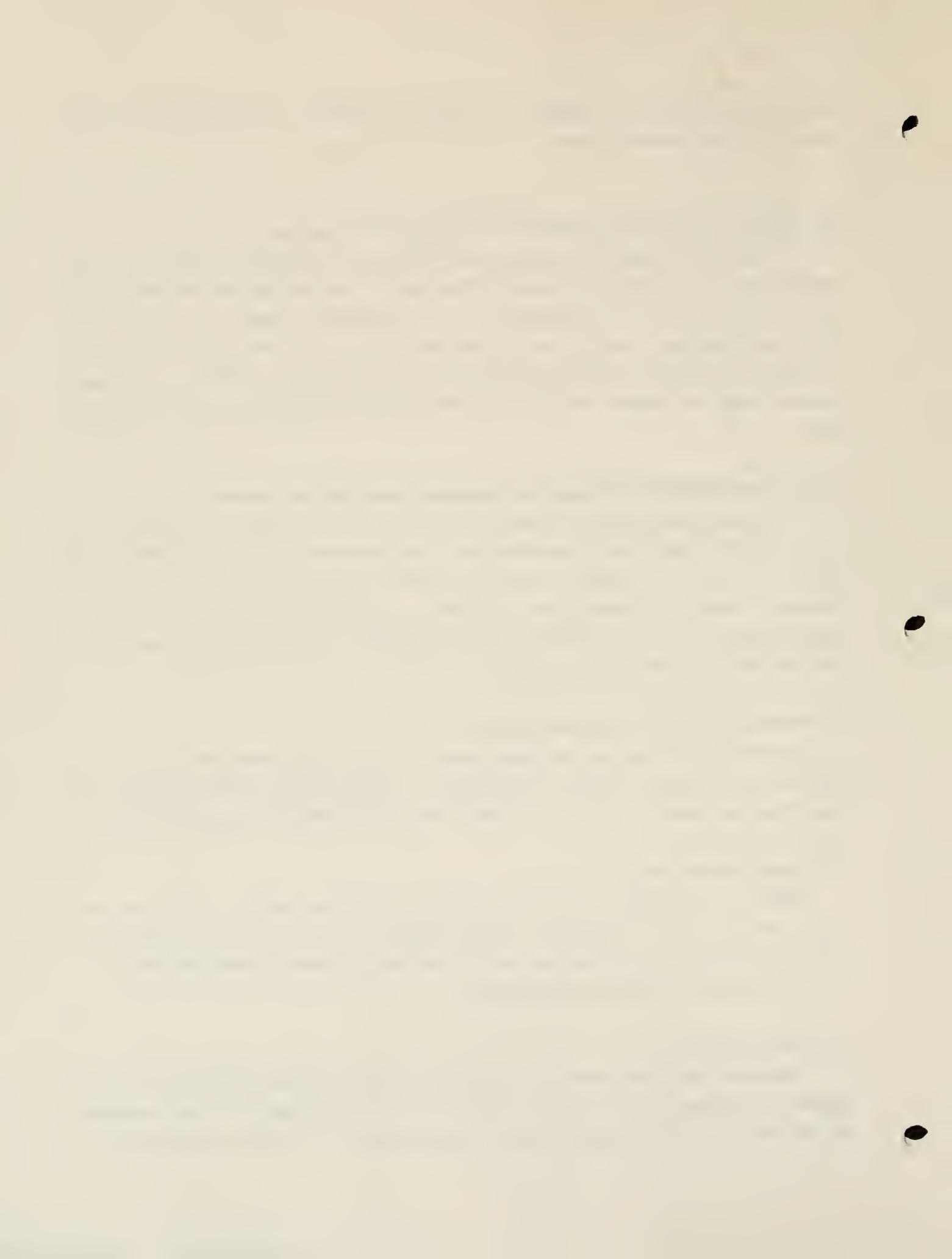
Because little contact has been made with the public near the site in the past two years, mailing lists need updating. Every progress report should have a section for people to fill out if they wish to be added to the mailing list.

11) Press contact list

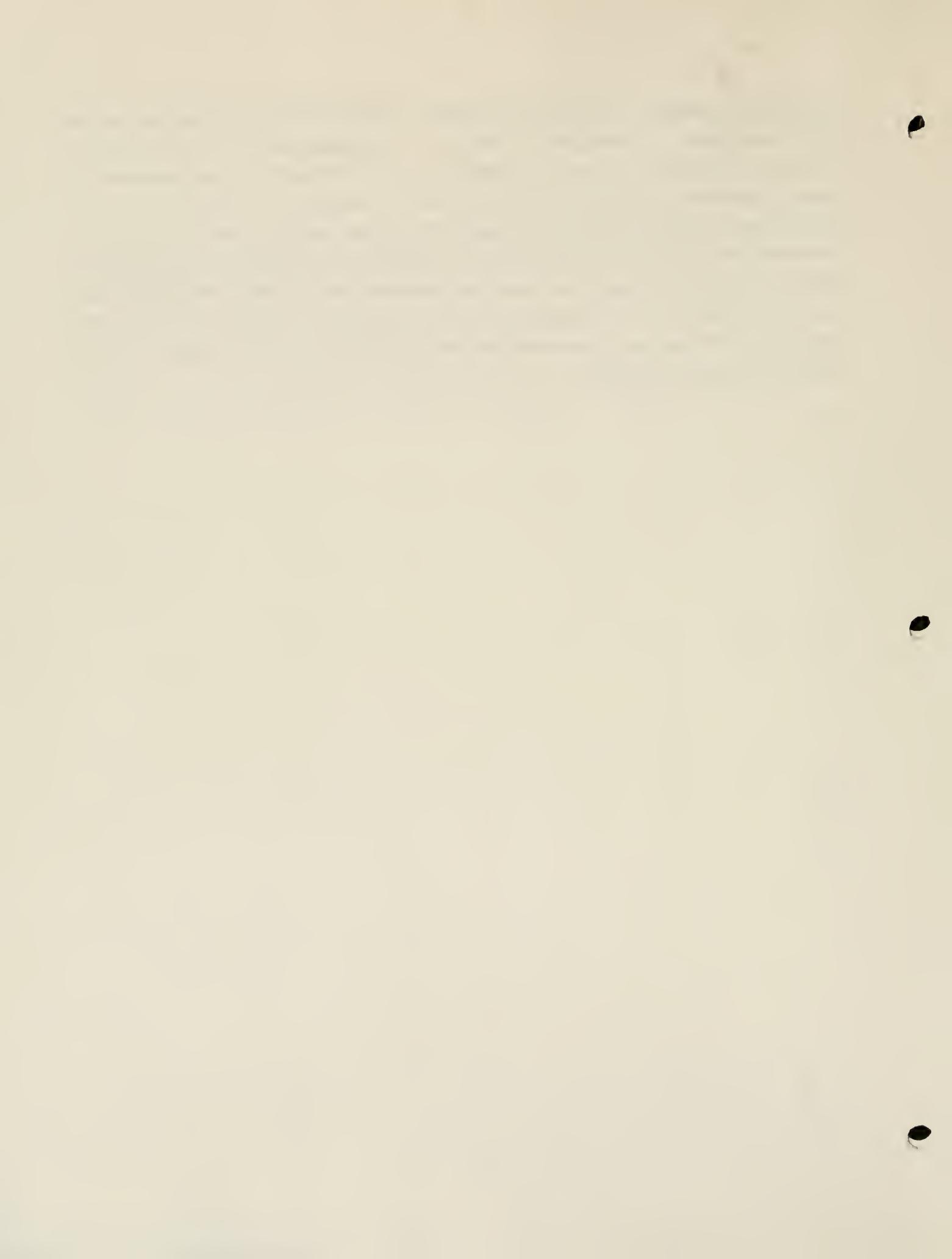
MDHES will maintain and yearly update the press contact lists for the site. The list will include all press contacts in the area and will note any special instructions such as the need to put public service announcements on 3 X 5 cards for certain radio stations.

12) Press meetings

Meetings with the press are especially helpful when MDHES has a large amount of information they would like to convey to the media. These meetings can be held in the afternoon before public meetings. In these press meetings



the project manager can give the reporter a brief rundown of what he or she will speak about at the public meeting. The advantages of this approach, versus no meetings or a press conference, are as follows: a) The reporter has ample opportunity to ask questions and clarify points; b) taking time with the press shows them that we are interested in them and in their accuracy; c) reporters who aren't as familiar with Superfund can catch up on more basic points; d) Superfund personnel and the reporter have a chance for better one-on-one discussion. The Superfund personnel can get a better feeling for the reporter's attitude and understanding of Superfund and build a better working relationship with the press.



APPENDIX A

INTERESTED PERSONS LIST



INTERESTED PERSONS LIST
FOR THE IDAHO POLE SUPERFUND SITE

Montana Department of Health and Environmental Sciences

Director's office
Solid and Hazardous Waste Bureau, Superfund manager
Kevin Kirley, project manager
Janie Stiles, Superfund public information officer
Montana Department of Health and Environmental Sciences
Room B201, Cogswell Building
Helena, MT 59620

EPA, Helena Office

John Wardell, director
Eric Finke, chief, Hazardous Waste and Toxics Branch
Stephanie Wallace, remedial project manager
U.S. EPA
Federal Building
301 South Park
Helena, MT 59626

State Agencies

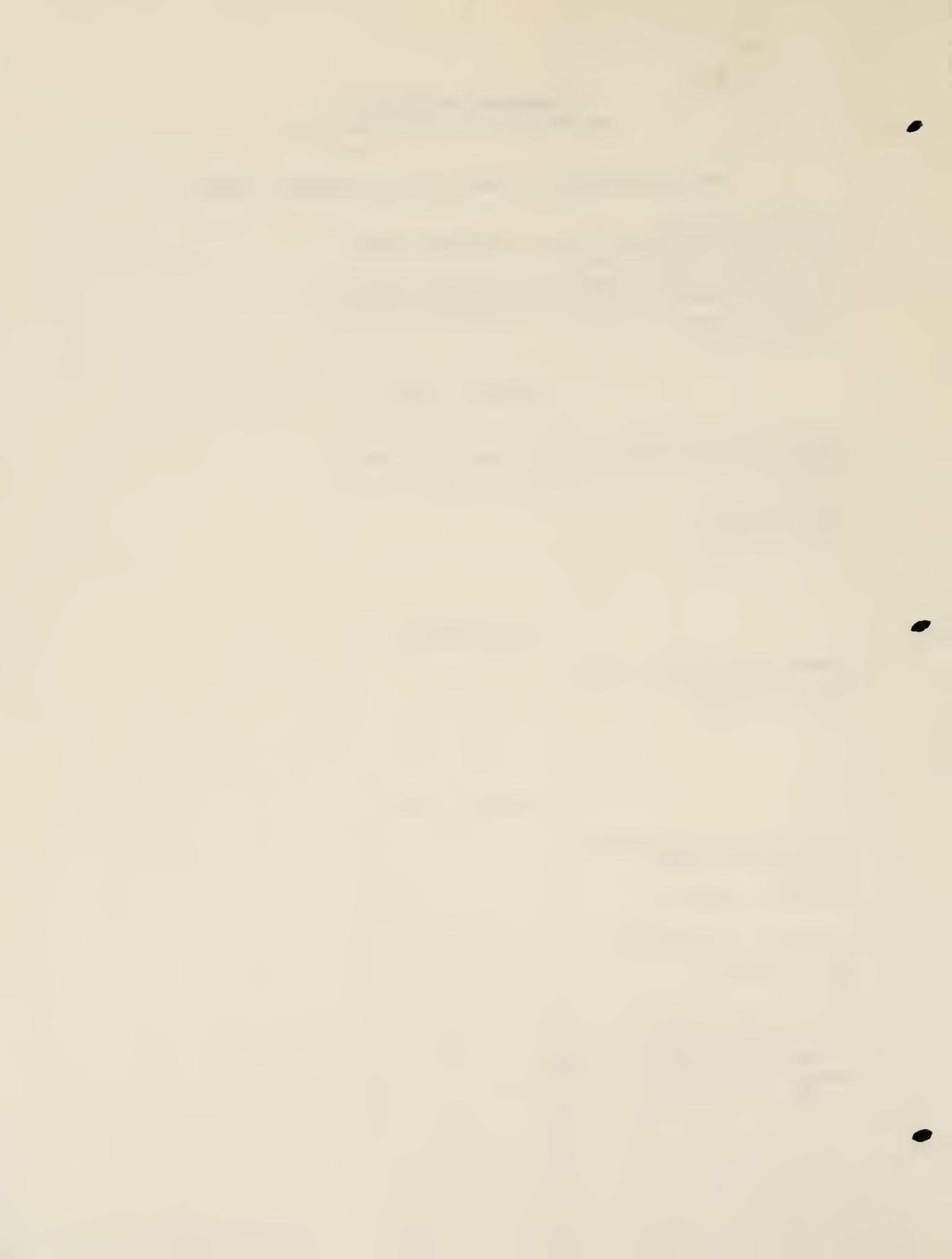
Governor Stan Stephens Office
Capital Building
Helena, MT 59620

Federal Agencies

U.S. Fish and Wildlife Service
1504 14th Street West
Suite 230
Billings, MT 59102

U.S. Fish and Wildlife Service
301 South Park
Helena, MT 59626

U.S. Geological Survey
Attn: Joe Moreland
301 South Park, Federal Building
Helena, MT 59626-0076



Local Legislators

Sen. Paul F. Boylan
3747 South 19th Rd.
Bozeman, MT 59715

Sen. Dorothy Eck
10 West Garfield
Bozeman, MT 59715

Sen. Sam Hofman
6210 Camp Creek Road
Manhattan, MT 59741

Rep. Dorothy Bradley
919 West Lamme
Bozeman, MT 59715

Rep. John Vincent
1020 South Third
Bozeman, MT 59715

Rep. Norm Wallin
2422 Springcreek Dr.
Bozeman, MT 59715

Rep. Vernon Westlake
3186 Love Lane
Bozeman, MT 59715

Media

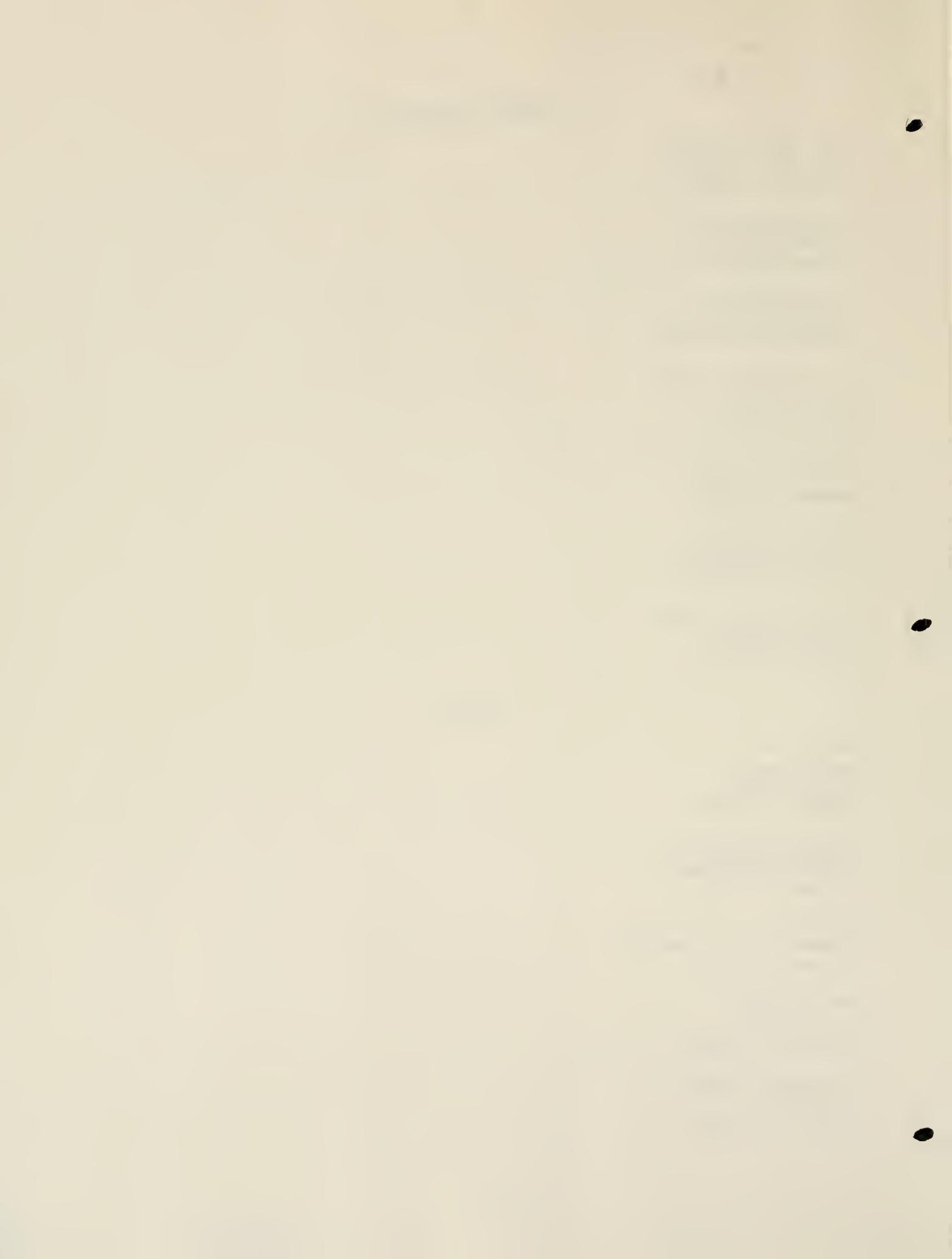
KCTZ - TV
News Director
1128 East Main
Bozeman, MT 59715

Bozeman Chronicle
32 South Rouse Ave.
Bozeman, MT 59715

KUSM - TV
Montana State University
Bozeman, MT 59717

KBMN AM Radio
P.O. Box 1230
Bozeman, MT 59715

KBOZ-AM/FM Radio
P.O. Box 20
Bozeman, MT 59715



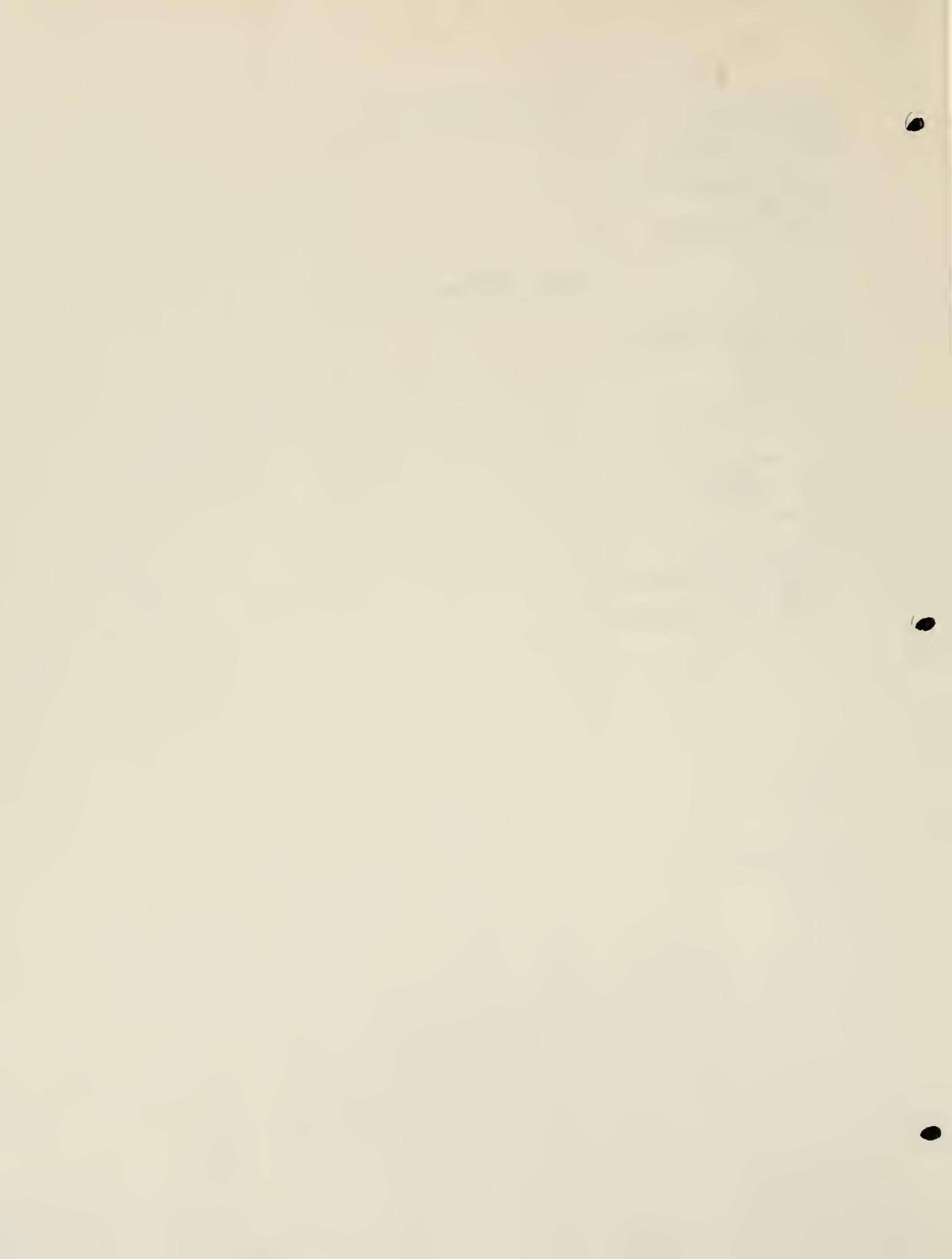
KXXL-AM Radio
1450 Kagy Blvd.
Bozeman, MT 59715

Associated Press
P.O. Box 5810
Helena, MT 59604

Local Government Officials

County Commission:
Raymond White - chairman
Jane Jelinski
Dave Pruitt
P.O. Box 1905
Bozeman, MT 59715

City Commission:
Mayor Al Stiff
James Goehrung
Bob Hawks
Walter Martel
Mary Vant Hull
c/o Clerk of Commission
P.O. Box 640
Bozeman, MT 59771-0640



APPENDIX B

SAMPLE ACCESS FORMS



QUESTIONS AND ANSWERS ABOUT WELL SAMPLING AT THE IDAHO POLE SUPERFUND SITE

WHO?

The Montana Department of Health and Environmental Sciences and the U.S. Environmental Protection Agency are conducting Superfund studies in and around the Idaho Pole Superfund site in Bozeman. A contractor for EPA, Ecology and Environment, represented by Melissa Haines, and another person will be taking the actual 1-1/2 gallon samples. Contact one of the following people if you have questions or concerns about the sampling:

Janie Stiles or Kevin Kirley with MDHES
1-800-648-8465 or 444-2821

or

Stephanie Wallace with EPA
449-5414

WHAT?

We will be sampling domestic wells in homes adjacent to the Idaho Pole site. We are trying to determine if organics associated with wood-treating have reached any of the wells in the area. We need a springtime sample because this is the time when groundwater will probably be at its highest level. If contamination is present, it will be at its highest potential level of the year.

HOW?

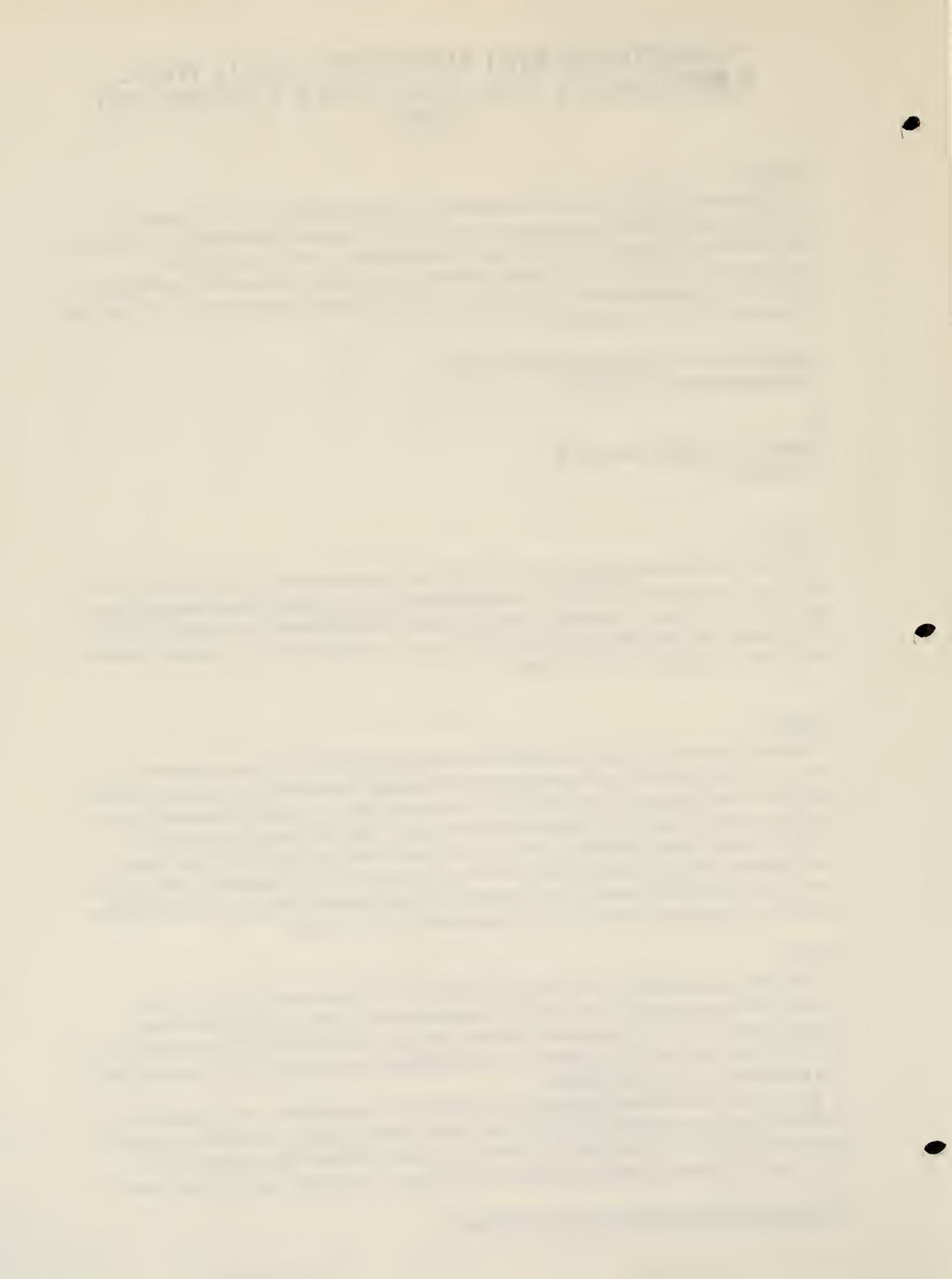
Melissa Haines will begin sampling the evening of May 2 and most of the day on May 3. She will need to run your water first to purge the well and to make sure she is getting a fresh sample. If you prefer, this water can be run through a garden hose or sprinkler on your lawn so the water is not wasted. If the sample is taken from an outside faucet it must draw its water from the same well as your household water. If you have a sudden change of plans and won't be home when Melissa is scheduled to arrive, please leave a note for her (perhaps she can take the sample from an outdoor faucet), or please call Janie Stiles at the above phone number.

WHY?

The EPA well sampling will complement Idaho Pole Superfund site remedial investigation study which the Montana Department of Health and Environmental Sciences and the Environmental Protection Agency are conducting. The results of the well sampling will help us determine if contaminated groundwater may be spreading in the direction of your neighborhood.

Periodically, we will send out progress reports on site activities. Your name will automatically be added to the site mailing list for these reports. Please let us know if you would rather not be added. If you wish to receive further information about Superfund in general, please contact Janie Stiles at the phone number listed above.

THANK YOU FOR YOUR COOPERATION!



RESIDENT CONTACT SHEET

NAME _____

ADDRESS _____

PHONE _____ HOUSE DESCRTION _____

DATE _____ TIME _____ TYPE OF CONTACT _____

PREFERRED DATE AND TIME OF SAMPLING _____

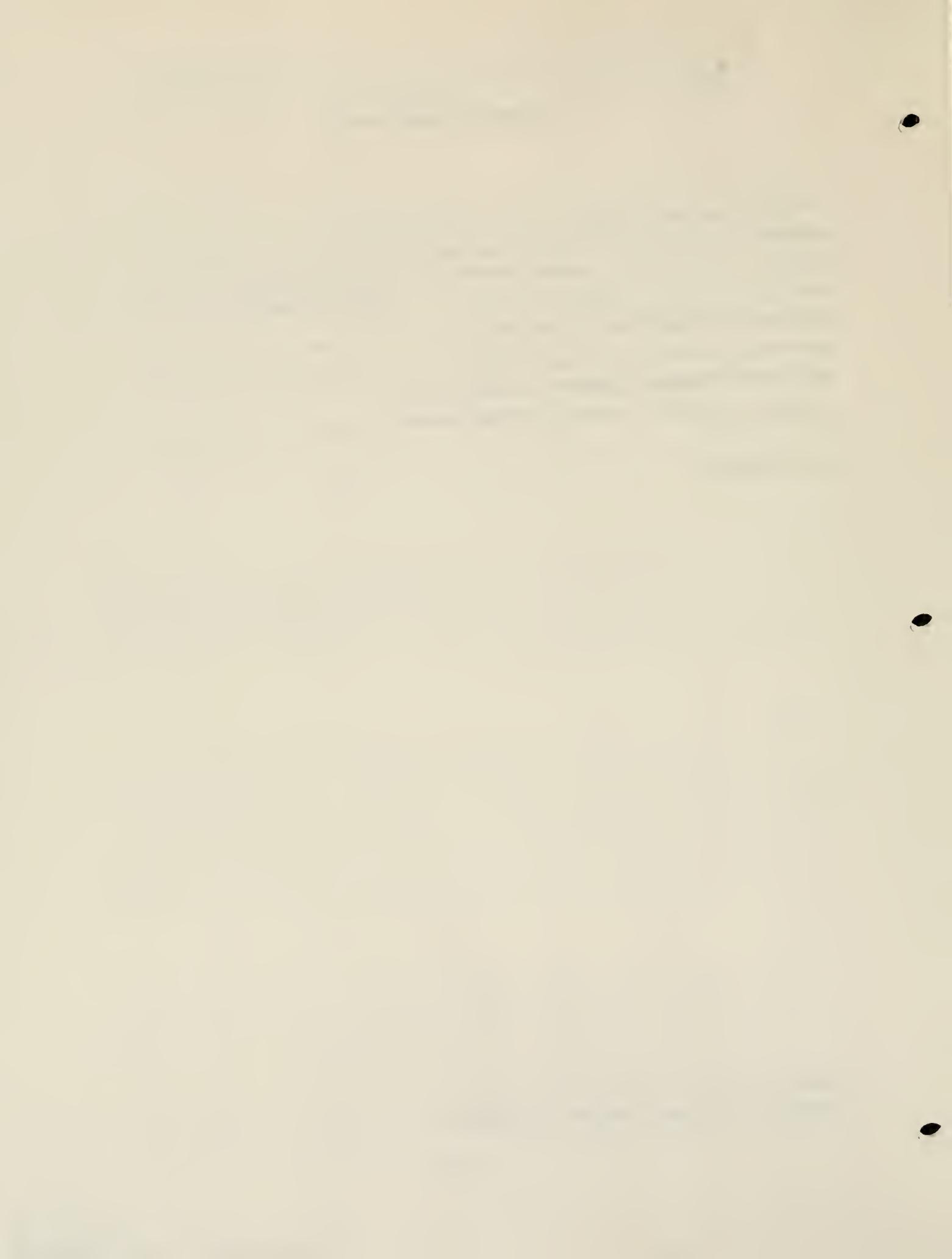
LOCATION OF FAUCET _____

DOES FAUCET REPRESENT DOMESTIC SUPPLY? _____

IS THERE A FILTER OR AERATOR ON WATER SUPPLY? _____

OTHER REMARKS:

INFORMATION OR PROJECT OFFICER'S SIGNATURE





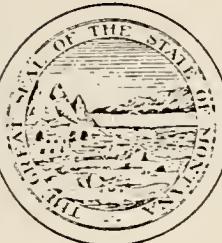
We have completed
Superfund Sampling on
your property.

Thank you for your cooperation.

If you have any questions, call Janie Stiles at
1-800-648-8465 (toll-free), or 444-2821.



DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

PERMISSION FOR ACCESS TO PROPERTY

I, the undersigned, am the owner, his representative, or otherwise control the real property at the location described below. Representatives of the Montana Department of Health and Environmental Sciences have informed me that elevated levels of heavy metals concentrations may be present at this location, and that they may be injurious to the health of persons residing on or near this property. I also understand that further investigative efforts are needed to describe the source of this contamination and define its extent in this vicinity.

I hereby give permission to Montana Department of Health and Environmental Sciences and their contractors and subcontractors, as well as their employees, agents and other designated representatives (who may include state and local agencies and their officials), to have access to my property and to undertake such investigations, monitoring, surveying, testing and other information-gathering as may be necessary.

Activities will consist of soil sampling.

I understand that the work described above may involve, among other things, disturbance of vegetation and the top few inches of soil on my property. I also understand that any disturbed vegetation will be restored to substantially the same condition as existed prior to such disturbance.

Property Address:

Signature of Owner/Occupant (all joint owners and tenants must sign):

(Signature)

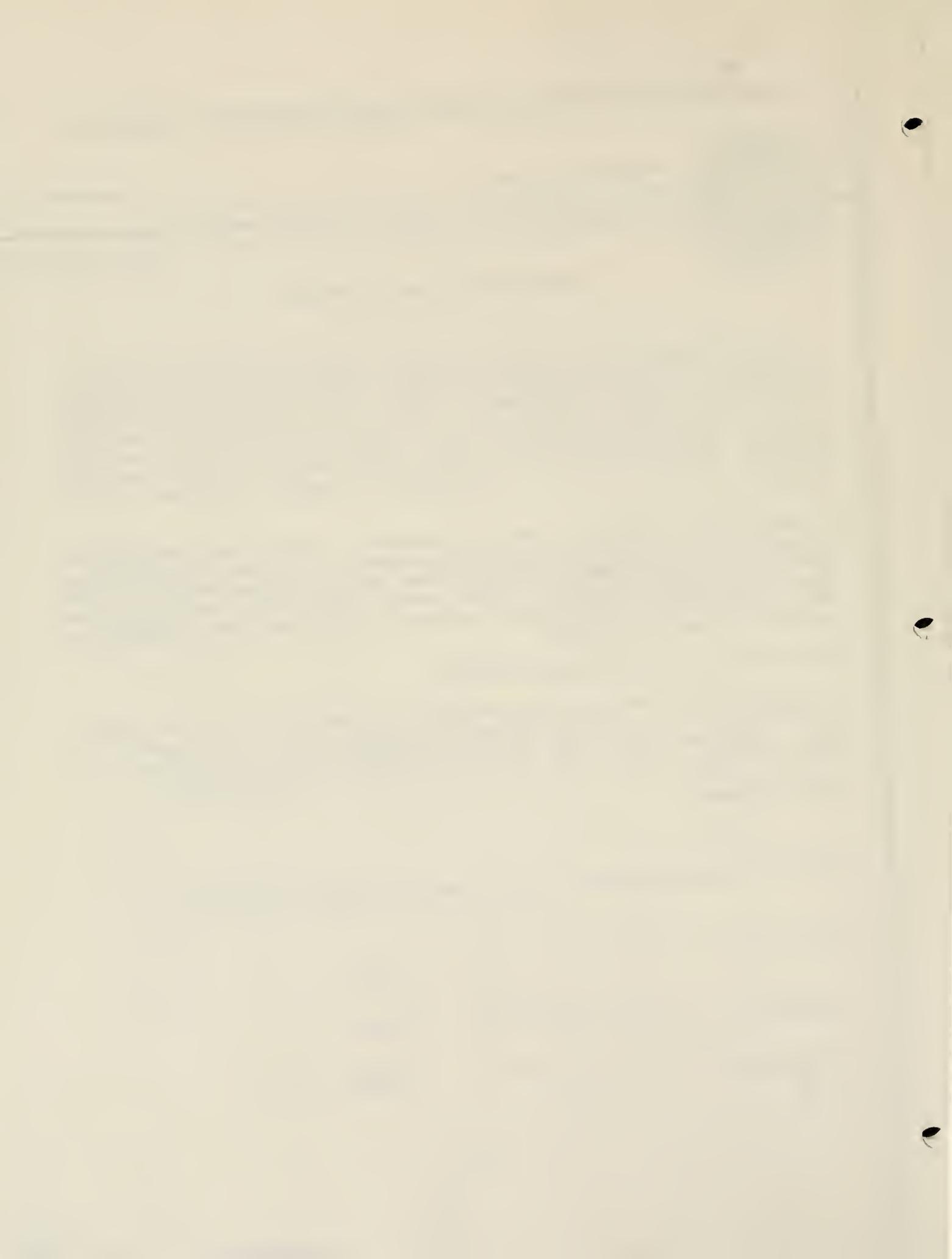
(Date)

(Signature)

(Date)

(Signature)

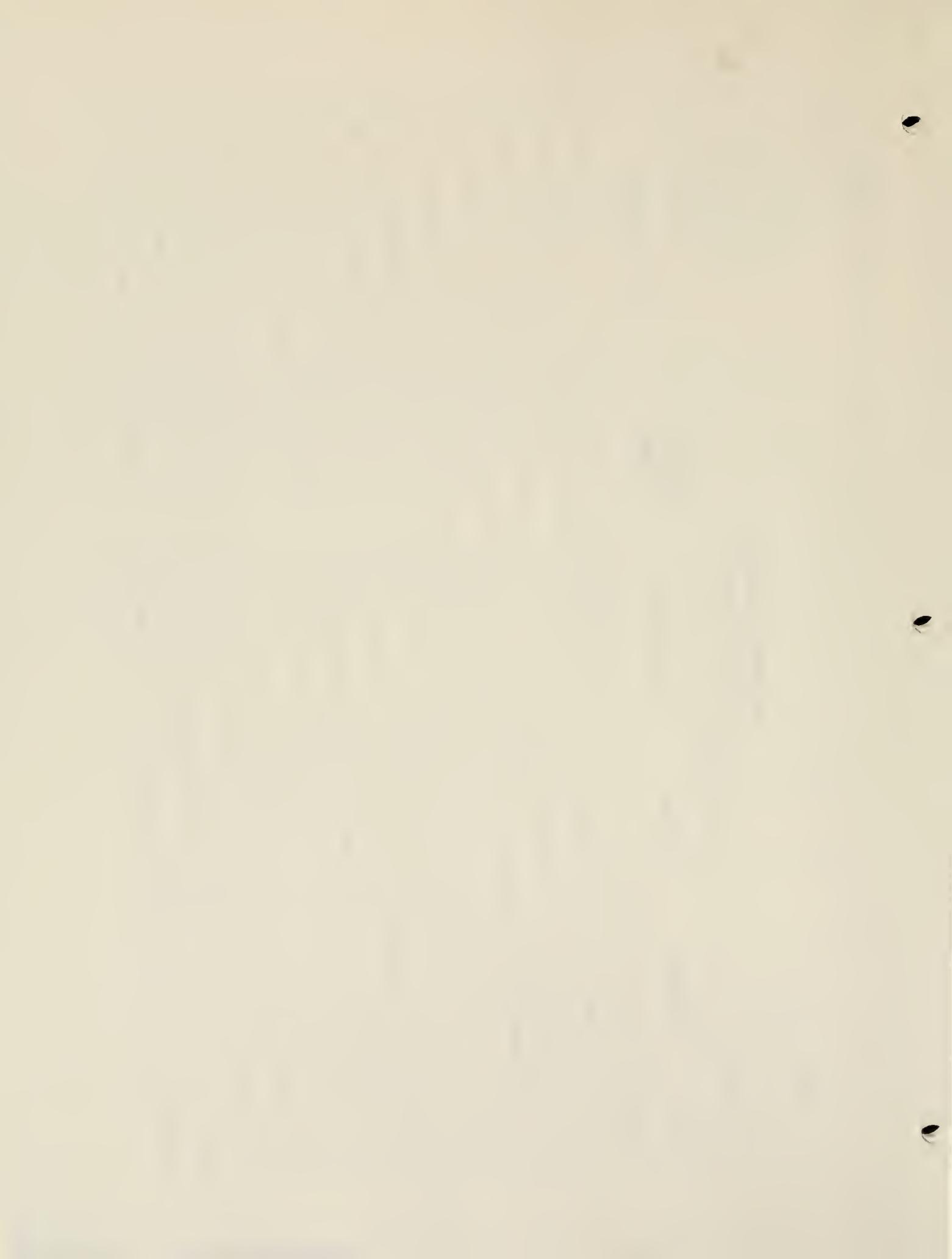
(Date)



DATE _____
DAY _____

APPOINTMENT NOTEBOOK
(Sample Page)

TIME	ADDRESS	RESIDENT	TYPE OF WORK	SUPERFUND PERSONNEL	SPM or DESIGNATE
8 A.M.					
9					
10					
11					
12 P.M.					
1					
2					
3					
4					
5					
6					
7					

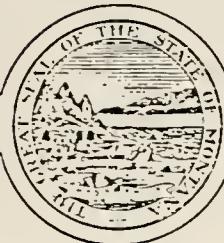


APPENDIX C

SAMPLE PRESS RELEASE



DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 5962

Solid & Hazardous Waste Bureau
(406) 444-2821

Sept. 21, 1988

FOR IMMEDIATE RELEASE
"STARS" FIELD WORK BEGINS

HELENA -- Field work on the Superfund Streambank Tailings and Revegetation Study, nicknamed STARS, began last week along Silver Bow Creek from Butte to the Warm Springs Ponds. Blankenship Construction of Butte started Tuesday installing short access roads to the test areas.

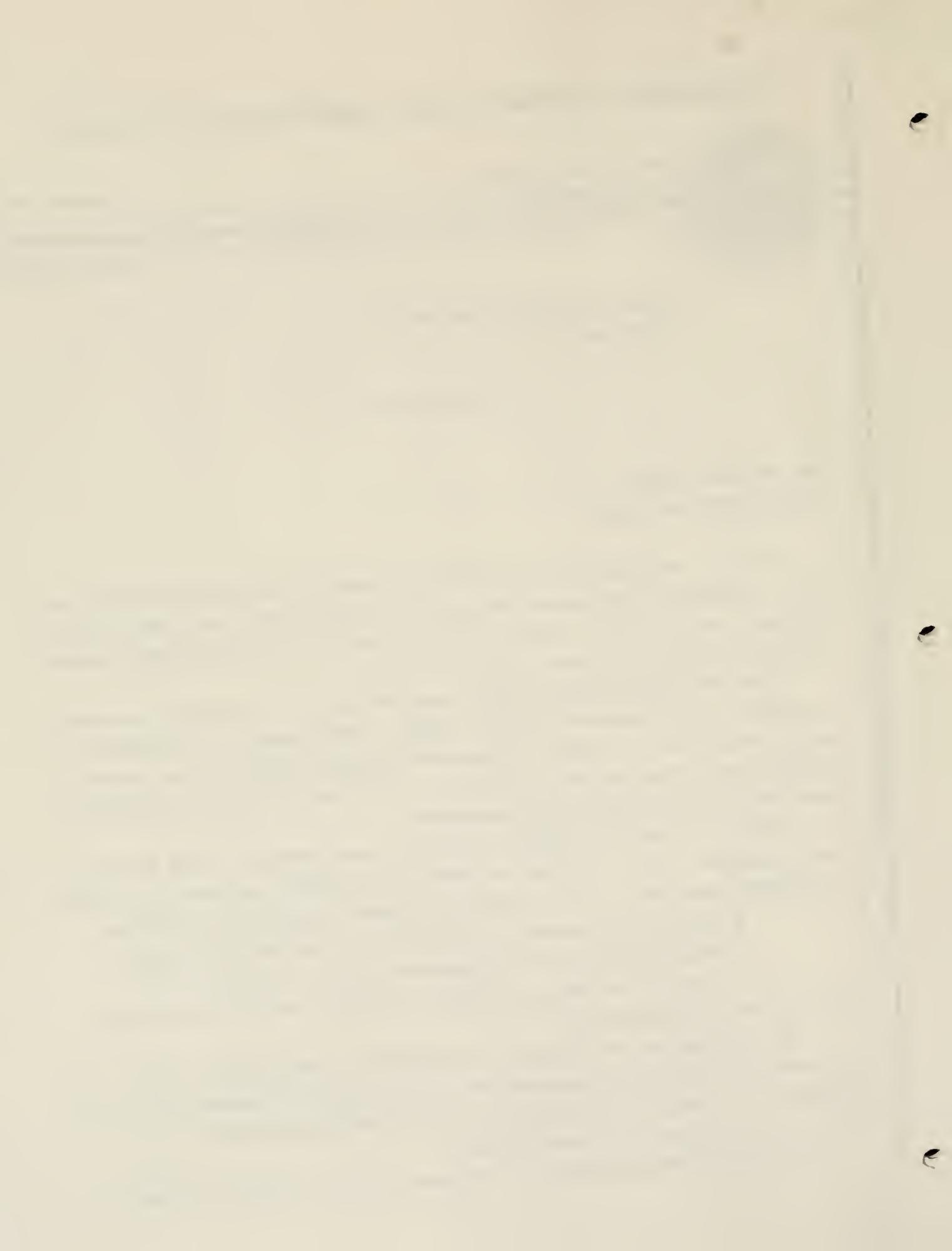
STARS is an experimental project being conducted by the Montana Department of Health and Environmental Sciences (MDHES). The purpose is to determine if soils along Silver Bow Creek, contaminated by heavy metals, can be treated to eliminate the threat of these materials to the public health, and eliminate their detrimental effects on the environment.

During the past year, MDHES contractors have conducted STARS laboratory and greenhouse tests. The goal of STARS is to develop and test new methods which MDHES hopes will solve a variety of problems including the following:

- ♦ reducing the movement of metals into surface and ground water
- ♦ minimizing erosion of contaminated soils by water and wind
- ♦ reducing the chances of people, wildlife, and livestock coming in contact with metal-rich soils.

The building of access roads is expected to take about a week. When Blankenship Construction completes road building, MDHES contractors will plow up small test plots, 16- by 20-feet, in five locations along the creek. Each of the five locations will have 24 plots.

"The plots best represent the different types of soils and conditions



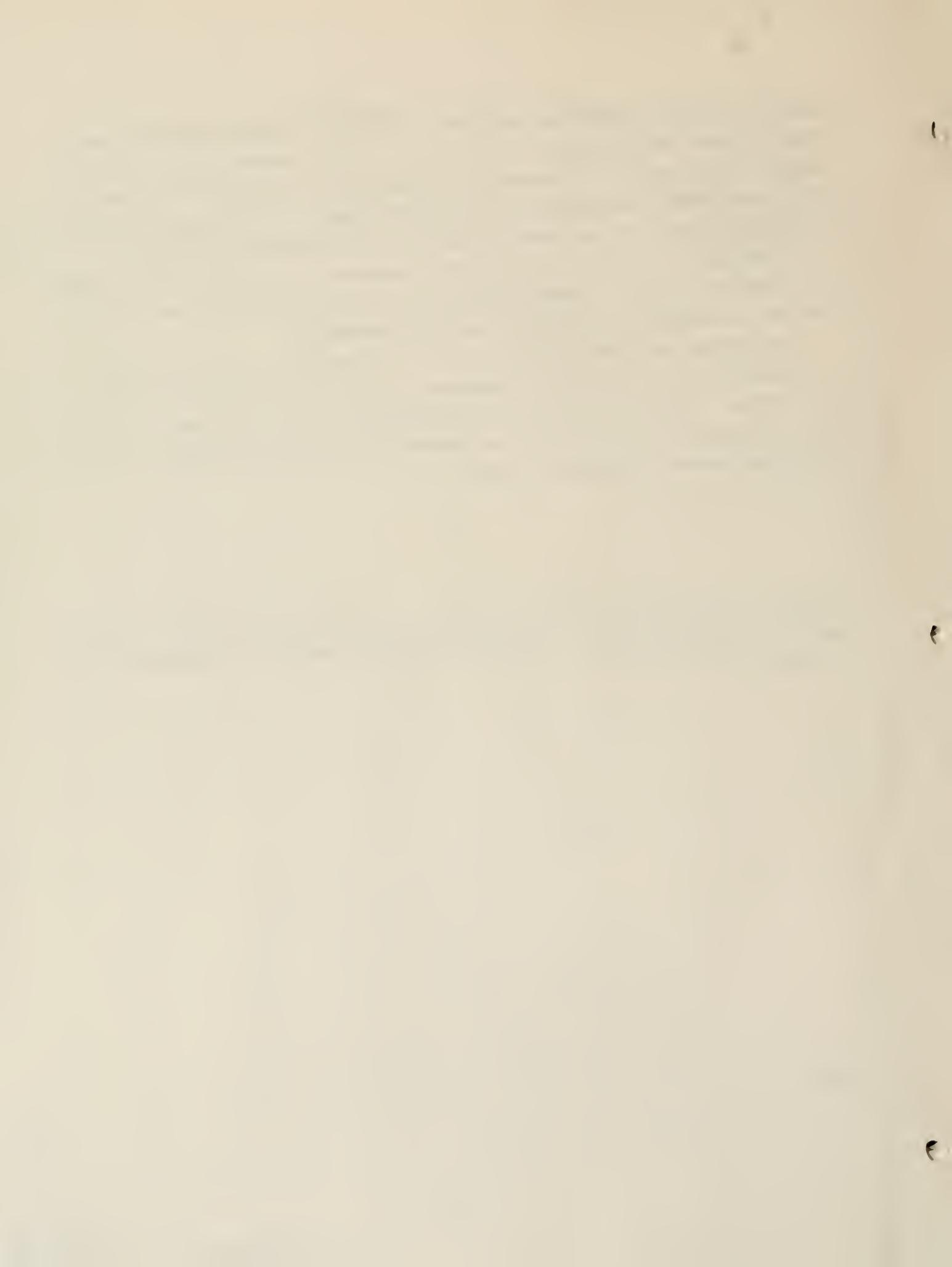
found in the area," DeMarinis explained. "The types of grasses we will test in the plots have been determined to grow well in harsh climates and in high-acid soils." Contractors are currently determining the exact plot locations, and plot construction is expected to start this week. If the ground does not freeze soon, there will be time for MDHES to seed the plots this fall.

"The STARS project is a small, but important, part of the entire Silver Bow Creek site project. STARS is one of a variety of options to be considered for the contaminated streambanks," DeMarinis explained.

The Silver Bow Creek site is one of nine Superfund sites in Montana. It runs from Butte to the Milltown Reservoir, via Silver Bow Creek and the Clark Fork River. CH2M Hill of Helena, in conjunction with the Reclamation Research Unit of Montana State University and Schafer and Associates of Bozeman, are the MDHES contractors conducting the STARS work.

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For more information call Kathy DeMarinis, project manager, or Janie Stiles, public information officer, at the MDHES Superfund hotline at 1-800-648-8465 or 444-2821.



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